

Before The
Federal Communications Commission
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Advanced Television Systems)
and Their Impact Upon the)
Existing Television Broadcast)
Service)

MM Docket No. 87-268

To: The Commission

COMMENTS ON MSTV PROPOSED DTV TABLE OF ALLOTMENTS

Central Michigan University ("CMU"), licensee of noncommercial educational television stations WCMU-TV, Mt. Pleasant, WCML(TV), Alpena, and WCMV(TV), Cadillac, all in Michigan, by its counsel, provides these comments on the modified DTV table of allotments, as proposed by the "Ex Parte Submission Based on New Technical Discoveries to Help the Commission Improve the DTV Table of Allotments/Assignments Submitted by the Association for Maximum Service Television, Inc. and Other Broadcasters," filed November 20, 1997 (the "MSTV Submission").^{1/} CMU is sympathetic to the concerns underlying MSTV's proposed changes in the table and generally supports those changes that are of benefit to public broadcasters, as set forth in the separate filing by the Association of America's Public Television Stations and the Public Broadcasting Service ("APTS/PBS").

^{1/} By Public Notice dated December 2, 1997, the Commission provided until December 17, 1997, for interested parties to comment on the MSTV Submission.

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CMU also specifically supports one particular allotment change proposed by MSTV in the table--the substitution of DTV Channel 42 for Channel 56 as the paired digital allotment for noncommercial educational television station WCMU-TV, Mt. Pleasant, Michigan,.

On June 13, 1997, CMU filed a petition for reconsideration, taking issue with the *Sixth Report and Order* in MM Docket No. 87-268, FCC 97-115 (released April 21, 1997) ("*Sixth R&O*"), insofar as it allotted Channels *56, *57 and *58 for WCMU-TV, WCML and WCMV, respectively, as their paired digital TV channels.

As noted, the proposed MSTV table suggests a resolution to CMU's concerns about WCMU-TV by allotting DTV Channel 42, as CMU had urged. So far as CMU can determine; this change can be made without resulting in any significant reduction in coverage for existing NTSC stations or in replication by DTV facilities. CMU therefore supports this proposed change.

Thus, CMU supports the MSTV Submission to the extent that it suggests changes that generally benefit public broadcasters, and proposes the substitution of DTV Channel 42 for Channel 56 for WCMU-TV. CMU also urges the Commission to accommodate the other DTV channel allotment requests raised by CMU in its previous submissions, namely, the substitution of DTV Channel 23 for Channel 57 for WCML, and the substitution of DTV Channel 10 for DTV Channel 58 for WCMV.

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Respectfully submitted,

CENTRAL MICHIGAN UNIVERSITY

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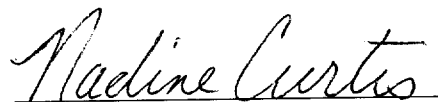
CERTIFICATE OF SERVICE

I certify that I have this 17th day of December, 1997, served copies of the foregoing "Comments on MSTV Proposed DTV Table of Allotments" by First Class U.S. Mail or by hand delivery upon the following:

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